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October 21, 2022

Honorable Renee Bumb
United States District Judge
Mitchell H. Cohen Federal Courthouse
One John F. Gerry Plaza
Fourth and Cooper Streets
Camden, NJ 08101

Re: United States v. Josue Pichardo
Criminal No. 21-289 (RMB)
Plea Withdrawal

Dear Judge Bumb:

I represent Josue Pichardo in the above referenced matter. On September 7, 2022, this Court held a hearing to determine whether Mr. Pichardo would be allowed to withdraw his previous plea. Your Honor ordered further briefing regarding the joint request. Mr. Pichardo's previous guilty plea was to possession with intent to distribute 100 grams or more of heroin on or about March 7, 2019 in Camden County, New Jersey and elsewhere. His anticipated plea would be conspiracy to possess with intent to distribute 100 grams or more of heroin and 40 grams or more of fentanyl, from in or around February 2019 through on or about April 3, 2019 in Camden County, New Jersey and elsewhere. For the reasons stated in the Government's letter brief of October 5, 2022, I join their request.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Stanley O. King', is written over a printed name. The signature is fluid and cursive.

Stanley O. King

Cc: Elisa Wiygul, AUSA
Josue Pichardo